

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: ELIZABETH THOMAS	§	
	§	
	§	
JAMES ALLEN AND ROBERT L THOMAS	§	
Plaintiffs	§	
vs	§	
McCARTHY & HOLTHUS LLP,	§	
ON BEHALF OF FLAGSTONE LENDING	§	
GROUP A NON-EXISTENT A UTAH	§	
CORPORATION, AND	§	Adversary Cause No. 22 AP 03024 Debtor
	§	
SUCCESSOR/ASSIGNEE J.P. MORGAN	§	
CHASE BANK N.A. and ELIZABETH	§	
THOMAS	§	
Defendants	§	
_____	§	
	§	
PRIMARY RESIDENTIAL MORTGAGE INC.	§	
Intervenor/Defendant	§	
vs.	§	
ELIZABETH THOMAS	§	
Defendant	§	

DEFENDANT'S EXHIBIT LIST

TO THE HONORABLE COURT:

COMES NOW Colleen M. McClure who hereby provides the following exhibit list
in Response to the Motion for Sanctions:

Exhibit "A" - Docket 55-1 2019 Pro Se Filings in Harris County Cause No. 2017-76078

Exhibit "B" - Docket 55-2 Email from Elizabeth Thomas Pro Se Cause No 2017-76078; In the 127th Judicial District of Harris County, Texas

Exhibit- "C" - Docket 55-3 Order of Withdrawal in 2017-76078 and Consolidated Cases

Exhibit “D” – Docket 55-5 Response to Motion contesting withdrawal in 2017-76078

Exhibit “E” – Docket 55-5 Signed Declaration of Robert L. Thomas in US Southern District Cause No. 19-CV-00323

Exhibit “F” – Docket 55-6 Emails from Elizabeth Thomas

Exhibit “G” – Docket 55-7 Removal to New York to Elizabeth Thomas’ bankruptcy

Exhibit “F” – Docket 55-8 Removal to New York to Elizabeth Thomas’ bankruptcy

Exhibit “G” – Docket 55-9 Joint letter of representation by James Andersen and Colleen McClure in Harris County District Court Cause No. 2017-82388

Exhibit “L” – Docket 55-11 Emails James Andersen

Exhibit “M” – Docket 55-13 Joint Notice of Removal to Federal Court

Exhibit “N” – Docket 55-14 Elizabeth Thomas Notice of Removal to Federal Court

Exhibit “O” – Docket 54-15 Affidavit of James Allen

Exhibit “P” – Docket 54-16 Joint Petition in Cause No. 2016-87941

Exhibit “Q” – Docket 54-17 Docket Sheet in Cause No. 2018-14171

Supplemented Exhibit A – Docket 64-1 Emails James Anderson regarding Appeal

Supplemented Exhibit A-1 – Docket 64-2 Email Elizabeth Thomas

Supplemented Exhibit B – Docket 64-3 Emails Elizabeth Thomas Threatening

Supplemented Exhibit C – Docket 64-4 Emails James Anderson regarding cases

Supplemented Exhibit D – Docket 64-5 Emails James Anderson regarding withdrawal and his signature needed as he was counsel for Elizabeth Thomas

Supplemented Exhibit E – Docket 64-6 Docket Sheet of lower court case number 2016-87941 showing counsel for parties

Supplemented Exhibit F – Docket 64-7 Docket Sheet of lower court case number 2014-54729 showing counsel for parties

Supplemented Exhibit G – Docket 64-8 Elizabeth Thomas emails

Supplemented Exhibit H – Docket 64-9 Emails regarding the appeal to the US Circuit Court of Appeals

Supplemented Exhibit I – Docket 64-10 Elizabeth Thomas threatening emails

Supplemented Exhibit J – Docket 64-11 Emails and letter regarding alleged race discrimination by Miramar Lakes HOA

Supplemented Exhibit K – Docket 64-12 Emails with James Andersen regarding Representation Agreement with the returned signed agreement with two different dates

Supplemented Exhibit L – Docket 64-13 Nineth Amended Petition in all cases in Harris County

Supplemented Exhibit M – Docket 64-14 Certified Copy of Order of Withdrawal affirming that Colleen McClure was not counsel for Elizabeth Thomas.

Supplemented Exhibit N – Docket 64-12 Lawsuit filed by Elizabeth Thomas against James Andersen.

Colleen McClure has served all documents on Elizabeth Thomas previously with the responses filed. All exhibits relate back to the US Southern District of Texas Docket Number.

Colleen McClure reserves the right to use any potential rebuttal exhibits and any other exhibits filed and attached to responses and supplemented responses that have not been specifically stated herein.

Respectfully submitted,

COLLEEN M. McCLURE
ATTORNEY AT LAW

By: /s/ Colleen M. McClure

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above foregoing Response has been sent to Elizabeth Thomas via email on July 29, 2024.

/s/ Colleen M. McClure

COLLEEN M. MCCLURE